

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

In re:	§	
	§	
SCOTT VINCENT VAN DYKE	§	Case No. 21-60052
	§	
Debtor.	§	Chapter 11 Case
	§	

**EVA ENGELHART, CHAPTER 7 TRUSTEE FOR THE BANKRUPTCY ESTATE OF
ANGLO-DUTCH PETROLEUM INTERNATIONAL, INC.'S
WITNESS AND EXHIBIT LIST FOR DECEMBER 15, 2021 HEARING**

WITNESSES:

1. Jeff Compton (expert);	<u>Judge:</u> Honorable Christopher M. Lopez Courtroom 401
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2. Charles E. Graham, III (expert);	<u>Hearing Date:</u> December 15, 2021
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3. Scott Van Dyke (fact);

4. Any rebuttal and/or impeachment
witnesses; and

5. All persons listed on the witness list of any party.	<u>Hearing Time:</u> 1:00 p.m.
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Parties' Names: Eva Engelhart, as Chapter 7
Trustee of the estate of Anglo-Dutch Petroleum
International, Inc. ("Chapter 7 Trustee")

Attorneys' Names: William Fred Hagans
Kendall Montgomery
Carl D. Kulhanek, Jr.
William R. Greendyke
Julie Goodrich Harrison

Attorney's Phone: (281) 884-9262
(713) 651-5151

Nature of Proceeding:

Confirmation Hearing

EXHIBITS:

<u>Ex.</u>	<u>Description</u>	<u>Offered</u>	<u>Objection</u>	<u>Admitted / Not Admitted</u>	<u>Disposition</u>
1.	Declaration and Expert Report of Jeffrey A. Compton				
2.	August 27, 2021 Order in Case No. 4:19-CV-2894; <i>Engelhart v. Van Dyke</i>				
3.	Deposition Transcript of Scott Van Dyke Taken December 9, 2021				
4.	Excerpts from Texas Petroleum Operations LLC General Ledger (Exhibit 12 to Van Dyke Deposition)				
5.	Order Releasing Supersedeas Deposits from the Court's Registry and Turnover Order in "Case No. 2004-20712; <i>ADPI v. Greenberg Peden</i> ; In the 61st Judicial Court of Harris County, Texas"				
6.	Anglo-Dutch Energy, L.L.C. Claims Register				
7.	Conclusions of Law in "Case No. 2004-48332; <i>Smith v. ADPI</i> ; In the 133rd Judicial Court of Harris County, Texas"				
8.	Order Granting Judgment Creditor Gerard J. Swonke's Motion to Contest the Affidavits of Net Worth and Motion for Injunction in "Case No. 2004-20712; <i>ADPI v. Greenberg Peden</i> ; In the 61st Judicial Court of Harris County, Texas"				
9.	Transcript of October 12, 2007 Hearing on Request for Temporary				

	Injunction in “Case No. 2004-20712; <i>ADPI v. Greenberg Peden</i> ; In the 61st Judicial Court of Harris County, Texas”				
10.	Findings of Fact and Conclusions of Law in “Case No. 2004-23845-A; <i>Case Funding Network v. ADPI</i> ; In the 127th Judicial Court of Harris County, Texas”				
11.	Excerpts from Transcript of Hearing on Motion to Modify Judgment in “Case No. 2004-23845-A; <i>Case Funding Network v. ADPI</i> ; In the 127th Judicial Court of Harris County, Texas”				
12.	Final Judgment in Case No. 4:19-CV-2894; <i>Engelhart v. Van Dyke</i>				
13.	ADPI Settlement with Halliburton				
14.	Copy of <i>Ramco v. ADPI</i> Opinion				
15.	Excerpts from Scott Van Dyke Deposition Taken March 31, 2009				
16.	Excerpts from Scott Van Dyke Trial Testimony in “Case No. 2004-23845-A; <i>Case Funding Network v. ADPI</i> ; In the 127th Judicial Court of Harris County, Texas”				
17.	Final Judgment in “Case No. 2004-48332; <i>Smith v. ADPI</i> ; In the 133rd Judicial Court of Harris County, Texas”				
18.	Summary Judgment in “Case No. 2004-2004-60996; <i>Littlemill Limited v. Van Dyke</i> ; In the 152nd Judicial Court of Harris County, Texas”				

19.	Final Judgment in “Case No. 2004-2004-60996; <i>Littlemill Limited v. Van Dyke</i> ; In the 152nd Judicial Court of Harris County, Texas”				
20.	Final Judgment in “Case No. 2004-23845-A; <i>Case Funding Network v. ADPI</i> ; In the 127th Judicial Court of Harris County, Texas”				
21.	Copy of <i>ADPI v. Haskell</i> Opinion				
22.	Final Judgment in “Case No. 2004-20712; <i>ADPI v. Greenberg Peden</i> ; In the 61st Judicial Court of Harris County, Texas”				
23.	Final Judgment in “Case No. 2011-54019; <i>Noel v. Van Dyke</i> ; In the 113th Judicial Court of Harris County, Texas”				
24.	Final Judgment in “Case No. 2018-34037; <i>ADPI v. Greenberg Peden</i> ; In the 127th Judicial Court of Harris County, Texas”				
25.	Copy of <i>Gladney v. ADE</i> Opinion				
26.	Copy of <i>ADE v. Crawford Hughes</i> Opinion				
27.	Email from Barnes to McMahon Dated February 20, 2021				
28.	Email from McMahon to Barber Dated August 9, 2019				
29.	Email from McMahon to Van Dyke Dated October 2, 2019				
30.	Email from McMahon to Van Dyke Dated October 28, 2019				
31.	Email from McMahon to Van Dyke Dated September 17, 2019				

32.	Affidavit of Scott Van Dyke Signed February 19, 2021				
33.	Scott Van Dyke's Plan of Reorganization [Dkt. No. 66]				
34.	Scott Van Dyke's Amended Plan of Reorganization [Dkt. No. 86]				
35.	Amended Notice of Rule 2004 Examination [Dkt. No. 79]				
36.	Frost Bank Statement dated 9-24-2020 (Exhibit 2 to Van Dyke Deposition)				
37.	Frost Bank statement dated 1-27-21 (Exhibit 3 to Van Dyke Deposition)				
38.	Frost Bank statement dated 2-24-21 (Exhibit 4 to Van Dyke Deposition)				
39.	Adams Prospect, Texas Gulf Coast, November 2021 (Exhibit 5 to Van Dyke Deposition)				
40.	Affidavit of Scott V. Van Dyke (Exhibit 7 to Van Dyke Deposition)				
41.	First Amendment to Revolver Loan Agreement and Options to Forgive Debt and Purchase Assets Between Trepador Energy LLC and Anglo-Dutch Energy LLC and Scott V. Van Dyke (Exhibit 8 to Van Dyke Deposition)				
42.	Before Closing diagram re Steven J. Borick Revocable Trust (Exhibit 9 to Van Dyke Deposition)				
43.	Partnership Interest Purchase Agreement (Exhibit 10 to Van Dyke Deposition)				

44.	E-mail dated 1-14-20 from Jett Williams to Mike Seely, et al., re: ADE-Noel (Exhibit 11 to Van Dyke Deposition)				
45.	Adams Prospect Input Pages				
46.	Adams Prospect Economic Inputs				
47.	Analog Production Analysis				
48.	Adams Prospect Economic Summary Projections				
49.	Additional Adams Prospect Economic Projections				
50.	Adams Prospect Cost Information				
51.	Any exhibit identified or admitted by any other party				
52.	Any rebuttal or impeachment exhibits				

The Trustee reserves (i) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the hearing; and (ii) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. The Trustee also reserves the right to rely upon and use as evidence (i) exhibits included on the exhibit lists of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: December 13, 2021.
Houston, Texas

Respectfully submitted,

HAGANS MONTGOMERY & RUSTAY, P.C.

By: /s/ William Fred Hagans

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- and -

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**ATTORNEYS FOR EVA ENGELHART,
CHAPTER 7 TRUSTEE OF THE
BANKRUPTCY ESTATE OF ANGLO-DUTCH
PETROLEUM INTERNATIONAL, INC.**

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service on the 13th day of December, 2021.

/s/ Julie Harrison

Julie Harrison